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To Christopher Lichens/R9/USEPA/US@EPA
cc Mike.Grigorieff@CH2M.com
bcc
Subject

Chris,

attached is the memo summarizing the DTSC comments on the Draft EECA. Please let me know if you have any questions.



Tom Draft EECA-DTSCcomments_051605.wpd Draft EECA-DTSCcomments_051605.pdf Draft EECA-DTSCcomments_051605.doc

Review of DTSC Comments on *Draft Engineering Evaluation and Cost Analysis, Omega Chemical Superfund Site, April 29, 2005*

TO: Christopher Lichens/USEPA Region IX

FROM: Tom Perina/CH2M HILL, Riverside

DATE: May 16, 2005

As you requested, CH2M HILL reviewed the document prepared by Camp Dresser & McKee, Inc. (CDM), dated April 29, 2005, titled *Draft Engineering Evaluation and Cost Analysis (EECA), Omega Chemical Superfund Site*. CDM prepared the subject document on behalf of the Omega Chemical Site PRP Organized Group (OPOG). The review comments were sent to your attention on May 11, 2005.

The Department of Toxic Substances Control (DTSC) also reviewed the EECA and prepared review comments dated May 6, 2005. As you requested, CH2M HILL will incorporate the DTSC comments in the review. The following is a summary of the DTSC comments that CH2M HILL believes should be included in EPA's EECA review memorandum and those comments that are more applicable to other on-going or future Omega activities, as discussed below.

Comments to Include

DTSC Comment 6: Some soils are described as "non-plastic" but classified as clay in the boring logs. Such material is better classified as silt. Boring logs should be reviewed and revised as needed; the corrections may require revision of the cross-sections.

DTSC Comment 7: The apparent water table mounding between OW1 and OW8 may be an indication of recharge from a water or sewer line leak. Mitigation of such leak, if it exists, would be beneficial to the Removal Action (RA). The evidence of a potential leak should be investigated.

Remaining Comments More Applicable to Other On-going or Future Omega Activities

The DTSC review was thorough and raised a number of important issues. The DTSC review seemed to focus more on remedial investigation (RI) issues, e.g., detailed characterization of subsurface conditions, etc., rather than EECA issues. The objective if the EECA is to implement an interim remedy while the detailed site characterization is part of an on-going RI. The conceptual site hydrogeology, for example, as summarized in the EECA, is sufficient for the interim RA. Accordingly, we recommend that many of the DTSC comments be retained for future site activities, specifically for the on-site soils RI and Operable Unit 2 groundwater RI.

Several DTSC comments (e.g., Specific Comments 15, 16, 17, General Comments 2, 3, Key Conclusions 2, 3) call for additional aquifer characterization for establishing the design basis. It should be noted, however, the design basis in the EECA is used for relative comparison of the alternatives and is not the basis of design of the actual system. Additional aquifer characterization will be performed during the implementation of the interim RA (i.e., pilot testing) and the system design basis will be modified as needed.

Some of the comments (e.g., 6 and 7) seem to refer to another document, possibly the Report Addendum for Additional Data Collection in the Phase 1a Area. DTSC should clarify the source of information they used. As noted above, comments 6 and 7 should be included in EPA's EECA review comments.

Several other comments should be clarified by DTSC so that they can be addressed in future RI work:

- Comment 10 is difficult to understand ("The lack of recharge at some wells...", "...limited aquifer conditions.") as written. DTSC should revise or clarify this comment.
- Comments 11 and 12 seem to be inconsistent with each other.